

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

COMMITTEE, AS PLAN ADMINISTRATOR OF)
THE PRUDENTIAL INSURANCE COMPANY OF)
AMERICA DEFERRED COMPENSATION PLAN)
and THE PRUDENTIAL INSURANCE COMPANY)
OF AMERICA,)

No. 23-cv-902

Plaintiffs,

v.

The Hon. Steven C.
Seeger, Judge Presiding

APRIL LaVENTURE and BRIGITTE FAUTEUX, IN)
HER CAPACITY AS INDEPENDENT EXECUTOR)
OF THE ESTATE OF GEORGE V. LaVENTURE,)

Defendants

BRIGITTE FATEUX,

Cross-Plaintiff

v.

APRIL LaVENTURE

Cross-Defendant

MOTION TO DISMISS CROSSCLAIM AGAINST APRIL LAVENTURE

Defendant/Cross-Defendant, April Laventure, through her attorneys, Beermann LLP, and pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, hereby moves this Court to enter an Order dismissing the Cross-Plaintiff, Brigitte Fateaux's Crossclaim against April (Dkt. No. 30) for failure to state claims upon which relief can be granted.

Respectfully Submitted,

By: /s/ Matthew D. Elster
One of April LaVenture's Attorneys

BEERMANN LLP
161 North Clark Street #3000
Chicago, Illinois 60601
312.621.9700
mdelster@beermannlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of September, 2023, a copy of the foregoing ***Motion to Dismiss*** was filed via the court's CM/ECF system, which will send electronic notice to all counsel of record who have appeared in this case.

/s/ Matthew D. Elster